



7 Times Square, New York, NY 10036-6569 Tel: 212-421-4100 Fax: 212-326-0806

New York | Los Angeles

[www.pryorcashman.com](http://www.pryorcashman.com)

**Sarah E. Bell, Esq.**  
Counsel

Direct Tel: 212-326-0401  
Direct Fax: 212-798-6912  
[sbell@pryorcashman.com](mailto:sbell@pryorcashman.com)

**APPLICATION GRANTED  
SO ORDERED** *Sarah Bell*

Septen **VERNON S. BRODERICK**  
**U.S.D.J.** 9/29/2019

**VIA ECF**

Judge Vernon S. Broderick  
United States District Court Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

The deadline for both Defendants to answer or otherwise respond to the complaint shall be adjourned until November 14, 2019. Absent exceptional circumstances, it is unlikely that additional extensions will be granted.

Re: **Namel Norris v. 81 Pearl Street Venture LTD, et al,**  
1:19-cv-06640 (VSB)

Dear Judge Broderick:

We were just retained to represent defendant Louise Properties Inc. ("Louise Properties") in the above-captioned Americans With Disabilities Act matter. We write with the consent of counsel for the Plaintiff and counsel for defendant 81 Pearl Street Venture LTD ("Pearl Street") (both defendants together, "Defendants") to request an adjournment of both Defendants' time to respond to the Complaint for approximately 45 days (the longer period due to the intervening Jewish holidays).

The reasons for the request are that we were just this morning retained to represent Louise Properties and request time to confer with our client, investigate the allegations in the Complaint, confer with Mr. Kleinberg and confer with counsel for the Plaintiff concerning a potential early resolution. We understand that Louise's time to respond to the Complaint expired on August 27, 2019; Pearl Street's time to respond to the Complaint expires this Monday, September 30, 2019. We request an adjournment on behalf of both Defendants since Defendants are, respectively, tenant and landlord, and request time to confer with each other concerning defense of this action.

I have spoken with counsel for Plaintiff, Bob Mirel, and counsel for Pearl Street, Adam Kleinberg, and they both consent to the request. This is Louise Properties' first request for an adjournment and Pearl Street's second request (the first request was granted).

Respectfully Submitted,

PRYOR CASHMAN LLP

By: /s/ Sarah E. Bell

Sarah E. Bell, Esq.

7 Times Square  
New York, NY 10036  
(212) 326-0401

*Attorneys for Defendant, Louise Properties Inc.*